Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
Central Regional Office • 627 Main Street, Worcester MA 01608 • 508-792-7650

DEVAL L. PATRICK
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Commissioner

FINAL AIR QUALITY OPERATING PERMIT

Issued by the Massachusetts Department of Environmental Protection ("The Department") pursuant to its authority under M.G.L. c. 111, §142B and §142D, 310 CMR 7.00 et seq., and in accordance with the provisions of 310 CMR 7.00: Appendix C.

ISSUED TO ["the Permittee"]:
FLEXcon Company, Inc.
South Spencer Road
Spencer, MA 01562

INFORMATION RELIED UPON
Transmittal No.: P-10646
Minor Modification Tr. W054330
Administrative Amendment Tr. X255328

FACILITY LOCATION:

FLEXcon Company, Inc.
South Spencer Road
Spencer, MA 01562

FACILITY IDENTIFYING NUMBERS:

SSIES ID No.: 118/0998
FMF FAC No.: 130929
FMF RO No.: 51617

NATURE OF BUSINESS:
Manufacturer of Pressure Sensitive Films

SIC CODE: 3081

RESPONSIBLE OFFICIAL:
Name: Michael Engel
Title: Chief Operating Officer
Phone: (508) 885-8200

FACILITY CONTACT PERSON:
Name: Darwin Irish
Title: Manager, Safety and Environmental
Phone: (508) 885-8200, ext. 8369

This operating permit shall expire on March 11, 2009.

For the Department of Environmental Protection, Bureau of Waste Prevention

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Roseanna E. Stanley, Acting Permit Chief
Bureau of Waste Prevention,
Department of Environmental Protection
Central Regional Office

5/24/2013
Date

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SPECIAL CONDITIONS FOR OPERATING PERMIT

1. PERMITTED ACTIVITIES

In accordance with the provisions of 310 CMR 7.00:Appendix C and applicable rules and regulations, the Permittee, FLEXcon Company, Incorporated, hereinafter ("The Permittee") is authorized to operate air emission units as shown in Table 1 and exempt, and insignificant activities as described in 310 CMR 7.00:Appendix C(5)(h) and (i). The units described in Table 1 are subject to the terms and conditions shown in Sections 4, 5, and 6 and to other terms and conditions as specified in this permit. Emissions from the exempt activities shall be included in the total facility emissions for the emission-based portion of the fee calculation described in 310 CMR 4.00 and this permit.

DESCRIPTION OF FACILITY AND OPERATIONS

The Permittee is a manufacturer of pressure sensitive film with two facilities located at Wall Street and Industrial Avenue in Spencer, Massachusetts. A Pressure Sensitive coater applies a thin film of solvent-based adhesive to a paper web, which is dried in an oven and combined, with a plastic film. The ovens are vented to a thermal oxidizer. The finished product is rewound for further processing such as top coating, slitting or sheeting. The Permittee is subject to 310 CMR 7.00, including 310 CMR 7.02, 310 CMR 7.16, 310 CMR 7.18, 310 CMR 7.00 Appendix B, 40 CFR 60, Subpart RR and 40 CFR 63, Subpart JJJJ.

The Permittee submitted Operating Permit Minor Modification BWP-AQ-10 to reflect changes to the facilities control equipment approved in NMCPA Transmittal No.: W045640, approved June 23, 2004 and amended February 1, 2005.

2. EMISSION UNIT IDENTIFICATION

The following emission units (Table 1) are subject to and regulated by this operating permit:

Table 1

Emission Unit	Description of Emission Unit	EU Design Capacity	Pollution Control Device
EU 1	Black Clawson, Pressure Sensitive Adhesive Label Coating Line (PS-3)	1680 yards/hour, 30 gph of coating/adhesive and two 1.25 MMBtu/hr. gas fired ovens.	ABB Air Pre-heater Model 2-40.OAS3 CombuChanger® RTO
EU 2	Artex Pressure Sensitive Adhesive Label Coating Line and corona treater (PS-4)	1690 yards/hour, 30 gph of coating/adhesive and two 1.25 MMBtu/hr. gas fired ovens.	Combustion Engineering Model 15.0 TRG70CorPak thermal oxidizer
EU 3[1]	American Tool, Pressure Sensitive Adhesive Label Coating Line, PS-5	1920 yard/hour, 35 gph of coating/adhesive and three 1.5 MMBtu./hr. gas fired ovens	ABB Air Pre-heater Model 2-40.OAS3 CombuChanger® RTO
EU 4	Custom Built Tower Coater #1, Top Coater- coating line (TC 2-1)	2040 yards/hour and 10 gph of coating/adhesive	ABB Air Pre-heater Model 2-40.OAS3 CombuChanger® RTO
EU 6[2]	American Tool In Line laminator with corona treater, (TC 4-1)	2400 yards/hour and 10 gph of coating/adhesive and three 1.0 MMBtu/hr. gas fired ovens	Alstrom Air Pre-Heater Company, Model 80-TNV5
EU 7	American Tool, Pressure Sensitive Adhesive Label Coating Line with corona treater (PS-6)	1920 yards/hour and 35 gph of coating/adhesive permit	Combustion Engineering Thermal Oxidizer
EU 8[2]	Faustel, Pressure Sensitive Adhesive Label Coating Line (PS-7)	2400 yards/hour and 40 gph of coating/adhesive and two 3 MMBtu/hr. gas fired ovens	Alstrom Air Pre-Heater Company, Model 80-TNV5
EU 9[2]	Faustel Pressure Sensitive Adhesive Label Coating Line and corona treater (PS-8)	3000 yards/hour and 35 gph of coating/adhesive and three ovens totaling 6 MMBtu/hr.	Alstrom Air Pre-Heater Company, Model 80-TNV5
EU 10	Custom Built Water Based Pressure Sensitive Adhesive Label Coating Line and corona treater (PS-9)	3000 yards/hour, 50 gph of water based coating/adhesive and three 2.5 MMBtu/hr gas fired ovens.	N/A
EU 11[2]	Faustel Pressure Sensitive Adhesive Label Coating Line and corona treater (PS-10)	2100 yards/hour, 50 gph of coating/adhesive and four ovens totaling 6.8 MMBtu/hr.	Alstrom Air Pre-Heater Company, Model 80-TNV5
EU 12[2]	Faustel Pressure Sensitive Adhesive Label Coating Line and corona treater (PS-11)	2100 yards/hour, 50 gph of coating/adhesive and three ovens totaling 5.2 MMBtu/hr.	Alstrom Air Pre-Heater Company, Model 80-TNV5
EU 13[3,4]	Faustel Pressure Sensitive Adhesive Label Coating Line and corona treater (PS-12)	3300 yards/hour, 50 gph of coating/adhesive and three ovens totaling 5.6 MMBtu/hr.	ABB Air Pre-heater 2-60.OAS5+ (RTO)/ Alstrom Air Pre-Heater Company Model 40.0TNV-5
EU 14[3,4]	Faustel Pressure Sensitive Adhesive Label Coating Line and corona treater, (PS-13)	6000 yards/hour, 100 gph of coating/adhesive and four ovens totaling 15.2 MMBtu/hr.	ABB Air Pre-heater 2-60.OAS5+ (RTO)/ Alstrom Air Pre-Heater Company Model 40.0TNV-5
EU 15	Custom VOC based Dye Coating line	1620 yards/hour and 30 gph of coating/adhesive	ABB Air Pre-heater Model 2-40.OAS3 CombuChanger® RTO
EU 16 [3,4]	BMB Pressure Sensitive Coating Line and corona treater (PS-14).	900 ft/min, 230 gph of coating/adhesive and ovens totaling 8.25 MMBtu/hr.	ABB Air Pre-heater 2-60.OAS5+ (RTO)
EU 17	Air Rotation heater	4.6 MMBtu/hr.	N/A
EU 18	Faustel Top Coating Line (TC 2-3)	6000 yards/hour and 30 gph of coating/adhesive and ovens totaling 3.2 MMBtu/hr.	ABB Air Pre-heater Model 2-40.OAS3 CombuChanger® RTO
EU 19	Noven Top Coating Line (TC 2-4)	3000 yards/hour and 10 gph of coating/adhesive and ovens rated at 3.0 MMBtu/hr.	ABB Air Pre-heater Model 2-40.OAS3 CombuChanger® RTO
EU 20[1]	Custom Built Silicon Release Coating and Pressure Sensitive Adhesive Coating Line (TC 2-5)	3000 yards/hour and 25 gph of coating/adhesive and ovens rated at 4.0 MMBtu/hr.	ABB Air Pre-heater Model 2-40.OAS3 CombuChanger® RTO

Note:
1 Phase I units EUs 3 and 20.
2 Phase II units EUs 6, 8, 9, 11 and 12.
3 Phase III units EUs 13, 14 and 16.
4 EUs 13 and 14 shall be ducted to the Alstrom Air Pre-Heater Company Model 40.0TNV-5 when Phase IV is implemented. EU 16 shall continue to be ducted to the ABB Air Pre-Heater 2-60.0AS5+(RTO). See Special Terms and Conditions, Table 8, Item 3.

3. IDENTIFICATION OF EXEMPT ACTIVITIES

The following have been found to be exempt activities as provided in 310 CMR 7.00: Appendix C (5)(h):

Table 2
Description Of Current Exempt Activities
The list of current exempt activities is contained in the Operating Permit application and shall be updated by the Permittee to reflect changes at the facility over the permit term. An up-to-date copy of exempt activities list shall be kept on-site at the facility and a copy shall be submitted to the Department's Regional Office.

4. APPLICABLE REQUIREMENTS

A. EMISSION LIMITS AND RESTRICTIONS

The Permittee is subject to the emission limits/restrictions as contained in Table 3 below:

Table 3

EU #	Raw Material	Pollutant	Emission Limit[1]	Restrictions	Applicable Regulation and/or Approval No.
EU 1, 3, 4, 15, 18[2], 19[2] and 20[2]	Adhesive Coating, Substrate and natural gas	VOC/HAPs	32.2 tpy Not to exceed 19.2 pounds VOC/hr. EU 3: 20.7 tpy 3.2 pounds VOC per gallon solids as applied averaged with units from the Wall Street facility.	Thermal oxidizer Inlet rate not to exceed 1030 pounds of VOC/hr. Outlet rate after 98% DRE not to exceed 19.2 pounds per hour. Maintain a minimum 1680 °F operating temperature or such temperature as determined by compliance stack testing to ensure a 98% DRE with a residence time of 0.3 seconds or greater. The thermal oxidizer shall burn natural gas only at a rate not to exceed 12,000 cubic feet/hour. 100% capture efficiency Opacity, exclusive of uncombined water shall not exceed 10% at all times during all modes of operation, including startups and shutdowns.	Permit Transmittal #W045640, amended 2/1/05 Permit Transmittal # W029171 Permit # C-P-89-008 Permit # CM-86-IF-035 Permit Transmittal # 131714, Amended 3/19/97 C-P-88-038 24 hr Bubble for VOC CM –77-IF-025 amended 7/28/78, 7/31/78 and 3/2/79 310 CMR 7:00 Appendix B
EU 2	Adhesive Coating, Substrate and natural gas	VOC/HAPs	EU 2 and 20: 23.5 tpy Not to exceed 3.84 pounds VOC/hr.	Thermal Oxidizer Inlet rate not to exceed 192.1 pounds of VOC/ hr. operate the thermal oxidizer at 98% removal efficiency, Maintain a minimum 1400 °F operating temperature with a residence time of 0.76 seconds or greater. The thermal oxidizer shall burn natural gas only at a rate not to exceed 8,700 cubic feet/hour. 100% capture efficiency. Opacity, exclusive of uncombined water shall not exceed 10% at all times during all modes of operation, including startups and shutdowns.	Permit Transmittal #W045640, amended 2/1/05 Permit Transmittal # W02917
EU 18, 19 and 20	Adhesive Coating, Substrate and natural gas	VOC/HAPs	N/A	EU 18 and EU 20 shall not exceed 18,600 gallons of solvent based coatings per month or 138,000 gallons of solvent based coatings per year[1] per EU. EU 19 shall not exceed 7,440gallons of solvent based coatings per month or 60,000 gallons of solvent based coatings per year[1]	Permit Transmittal # W029171 40 CFR 60, Subpart RR 40 CFR 63, Subpart JJJJ
EU 6, 8, 9, 11 and 12	Adhesive Coating, Substrate and natural gas	VOC/HAPs	EU 6: 4.6 tpy, not to exceed 5 gph of adhesive coating EU 8: 23.1 tpy, not to exceed 40 gph of adhesive coating EU 9: 20.2 tpy, not to exceed 35 gph of adhesive coating	Inlet rate not to exceed 874.3 pounds per hour. Maintain a minimum 1500 °F operating temperature or such temperature as determined by compliance stack testing to ensure a 99% DRE with a residence time of 0.3 seconds or greater. An hourly emission rate not to exceed 8.7 pounds per hour. The thermal oxidizer shall burn natural gas only at a rate not to exceed 18,000 cubic feet/hour.	Permit Transmittal #W045640, amended 2/1/05 CM-81-IF-010 amended 2/28/86 CM-82-IF-045 amended 2/28/86 CM-83-IF-036 amended 10/25/85 and 2/28/86

Table 3

EU #	Raw Material	Pollutant	Emission Limit[1]	Restrictions	Applicable Regulation and/or Approval No.
			EU 11 and 12: 26.72 tpy		CM-87-IF-001 CM-87-IF-001 Amended, 1/23/90 Incinerator replacement Acknowledgement letter 8/5/91 40 CFR 60, Subpart RR
EU 7	Adhesive Coating, Substrate and natural gas	VOC/HAPs	30.4 tpy	Not to exceed 35 gph of adhesive coating, Operate the overall unit efficiency 97%	CM-79-IF-001 CM-79-IF-001 amended 2/28/86 40 CFR 52.2
EU 10	Water base coating, Substrate and natural gas	NOx	4 tpy	100% water based coatings containing no VOC.	CM-87-IF-023 40 CFR 60, Subpart RR
		CO	1 tpy		
EU 13, 14, and 16 (Phase III)	Adhesive Coating, Substrate and natural gas	VOC/HAPs	EU 13 & 14: 52.92 tpy EU 16: 22 tpy	Inlet rate not to exceed 1728 pounds per hour. Maintain a minimum 1600 °F operating temperature or such temperature as determined by compliance stack testing to ensure a 99% DRE with a residence time of 0.3 seconds or greater. An hourly emission rate not to exceed 17.3 pounds per hour. EU 16 shall not to exceed 230 gph adhesive coating shall not bypass RTO while applying VOC coatings. Both EUs equipped with a water base bypass stack duct to be used only when producing water based coatings. The thermal oxidizer shall burn natural gas only at a rate not to exceed 18,000 cubic feet/hour.	Permit Transmittal #W045640, amended 2/1/05 Permit TR# 109961 C-P-89-008 amended 9/4/90 310 CMR 7.00 Appendix A 40 CFR 60, Subpart RR 310 CMR 7.18(1) 40 CFR 60, Subpart RR 310 CMR7.00: APP B
EU 13 and 14 (Phase IV)	Adhesive Coating, Substrate and natural gas		52.92 tpy	Inlet rate not to exceed 667.9 pounds per hour. Maintain a minimum 1500 °F operating temperature or such temperature as determined by compliance stack testing to ensure a 99% DRE with a residence time of 0.3 seconds or greater. An hourly emission rate not to exceed 6.6 pounds per hour. shall not bypass RTO while applying VOC coatings. Both EUs equipped with a water base bypass stack duct to be used only when producing water based coatings. The thermal oxidizer shall burn natural gas only at a rate not to exceed 9,000 cubic feet/hour.	Permit TR# W045640 Permit TR# 109961 C-P-89-008 amended 9/4/90 310 CMR 7.00 Appendix A 40 CFR 60, Subpart RR 310 CMR 7.18(1) 40 CFR 60, Subpart RR 310 CMR7.00: APP B
EU 16 (Phase IV)	Adhesive Coating, Substrate and natural gas		22 tpy	Inlet rate not to exceed 1727 pounds per hour. Maintain a minimum 1500 °F operating temperature or such temperature as determined by compliance stack testing to ensure a 99% DRE with a residence time of 0.3 seconds or greater. An hourly emission rate not to exceed 17.3 pounds per hour. shall not to exceed 230 gph adhesive coating shall not bypass RTO while applying VOC coatings. Both EUs equipped with a water base bypass stack duct to be used only when producing water based coatings.	Permit Transmittal #W045640, amended 2/1/05 Permit TR# 109961 C-P-89-008 amended 9/4/90 310 CMR 7.00 Appendix A 40 CFR 60, Subpart RR 310 CMR 7.18(1) 40 CFR 60, Subpart RR 310 CMR7.00: APP B

Table 3

EU #	Raw Material	Pollutant	Emission Limit[1]	Restrictions	Applicable Regulation and/or Approval No.
EU 1-4 and 6-16	Adhesive Coating, Substrate and natural gas	VOC/HAPs	N/A	Compliance with 40 CFR 63, Subpart JJJJ by December 5, 2005.	310 CMR 7.18(14) 310 CMR 7.18(16) 310 CMR 7.18(20) 40 CFR 63, Subpart JJJJ
EU 17	Natural Gas	PM	0.1 #/MMBtu	EU inspected and maintained in accordance with the manufacturers recommendations	310 CMR 7.04(4) 310 CMR 7.02(8)
EU 1,3,4, 6, 8, 9, 11, 12, 13, 14, 15, 16, 18,19,20		Opacity	Not to exceed 10%	Opacity from the ABB 2-40.0AS3, Alstrom Air Pre-Heater Company Model 40.0TNV-5, ABB Air Pre-Heater2-60.OAS5+ and Alstrom Air Pre-Heater Company, Model 80-TNV5 thermal oxidizers exclusive of uncombined water, shall not exceed 10% at all times during all modes of operation, including startups and shutdowns.	Permit Transmittal #W045640, amended 2/1/05
EU 1, 3, 4, 6, 7, 8,11, 12, 13, 14, 15, 16, 18, 19, 20		Capture efficiency	100%	See Note 2	Permit Transmittal #W045640, amended 2/1/05 40 CFR 51, Appendix M, method 204
Facility Wide	NA	VOC/HAPs	238.7 tpy facility wide cap	NA	Permit Transmittal #W045640, amended 2/1/05 Permit Transmittal # W029171 310 CMR 7.06(1)(a) 310 CMR 7.06(1)(b)
		Smoke	No. 1 of the chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the chart		
		Opacity	≤ 20%, except 20≤40% for ≤2 minutes during any one hour		

Notes: 1 Month shall consist of a calendar month and year shall be based on a twelve month rolling total .

2 100% capture efficiency shall be determined in accordance with the requirements of 40 CFR 51, Appendix M, Method 204, “Criteria for and Verification of a Permanent or Temporary Total Enclosure”.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to the monitoring, testing, record keeping, and reporting requirements as contained in Tables 4, 5, and 6 below and 310 CMR 7.00 Appendix C (9) and (10), as well as applicable requirements contained in Table 3:

Table 4

EU#	**Monitoring/Testing Requirements**
1,2, 3, 4, 6, 8, 9, 11, 12, 13,14, 15, 16, 18, 19 and 20	1.) In accordance with Permit No.: C-P-89-008, Permit Transmittal No. W029171 and W045640, amended February 1, 2005, the Permittee shall install, operate, monitor and record the center bed combustion zone temperature of the respective thermal oxidizers.
1,3,4, 15, 18, 19 and 20	2.) In accordance with Permit Transmittal No. W045640, amended February 1, 2005, Phase I, the Permittee shall demonstrate compliance with emission limits identified in Table 3 within 180 days of installation and operation of each new or modified thermal oxidizer. Emission testing will be conducted when Emission Units (coating lines) are added to the thermal oxidizers. Emission testing to demonstrate compliance shall be conducted in accordance with 310 CMR 7.13 and approved EPA reference test methods unless otherwise approved by EPA and the Department. The Permittee shall submit a pre-test protocol for Department review and approval 30 days prior to conducting such testing.
6, 8, 9, 11 and 12	3.) In accordance with Permit Transmittal No, W045640, Phase II, the Permittee shall demonstrate compliance with emission limits identified in Table 3 within 180 days of installation and operation of each new or modified thermal oxidizer. Emission testing will be conducted when Emission Units (coating lines) are added to the thermal oxidizers. Emission testing to demonstrate compliance shall be conducted in accordance with 310 CMR 7.13 and approved EPA reference test methods unless otherwise approved by EPA and the Department. The Permittee shall submit a pre-test protocol for Department review and approval 30 days prior to conducting such testing.
13,14 and 16	4.) In accordance with Permit Transmittal No, W045640, Phase III, the Permittee shall demonstrate compliance with emission limits identified in Table 3 within 180 days of installation and operation of each new or modified thermal oxidizer. Emission testing will be conducted when Emission Units (coating lines) are added to the thermal oxidizers. Emission testing to demonstrate compliance shall be conducted in accordance with 310 CMR 7.13 and approved EPA reference test methods unless otherwise approved by EPA and the Department. The Permittee shall submit a pre-test protocol for Department review and approval 30 days prior to conducting such testing.
13 and 14	5.) In accordance with Permit Transmittal No, W045640, Phase IV, the Permittee shall demonstrate compliance with emission limits identified in Table 3 within 180 days of installation and operation of each new or modified thermal oxidizer. Emission testing will be conducted when Emission Units (coating lines) are added to the thermal oxidizers. Emission testing to demonstrate compliance shall be conducted in accordance with 310 CMR 7.13 and approved EPA reference test methods unless otherwise approved by EPA and the Department. The Permittee shall submit a pre-test protocol for Department review and approval 30 days prior to conducting such testing.

Table 4	
EU#	**Monitoring/Testing Requirements**
7	6.) In accordance with CM-79-IF-001,amended 2/28/86, the Permittee shall continuously monitor and record the after burner temperature.
6, 8-14, 16, 18, 19 and 20	7.) In accordance with 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, The Permittee shall continuously record the destruction device combustion temperature during coating operations. The Permittee shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28°C (50°F) below the average temperature of the device during the most recent performance test complying with § 60.442(a)(2).
	8.) In accordance with §60.445(e) of 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, The Permittee shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 2.5°C.
EU 17	9.) In accordance with 310 CMR 7.04(4), the Permittee shall inspect and maintain the EU in accordance with the manufacturers recommendations and tested for efficient operation at least once each calendar year.
18, 19 and 20	10.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3350(e)), the Permittee shall install, operate, and maintain a Continuous parameter monitoring system ("CPMS").
	11.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3350(f)), the Permittee shall develop a site-specific monitoring plan for the capture system in accordance with all applicable requirements. The Permittee shall monitor the capture system in accordance all applicable requirements. The Permittee shall make the monitoring plan available for inspection by the permitting authority upon request.
	12.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3360(e)), the Permittee shall conduct an initial performance test to establish the destruction or removal efficiency of the control device. The initial performance test shall be conducted such that control device inlet and outlet testing is conducted simultaneously, and the data is reduced in accordance with applicable requirements.
	13.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3360), the Permittee shall determine capture efficiency in accordance with applicable requirements. (1) The Permittee may assume capture efficiency equals 100 percent if the capture system is a permanent total enclosure (PTE). The Permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR part 51, appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

Table 4	
EU#	**Monitoring/Testing Requirements**
Facility Wide	14.) In accordance with 310 CMR 7.13(1), if and when the Department determines that stack testing is necessary to ascertain compliance with Department's regulations or design approval provisos the Permittee shall cause such stack testing: a) to be conducted by a person knowledgeable in stack testing, b) to be conducted in accordance with procedures contained in a test protocol approved by the Department, c) to be conducted in the presence of a representative of the Department when such is deemed necessary.
	15.) In accordance with 310 CMR 7.13(2), if and when the Department determines that stack testing to ascertain the mass emission rates of air contaminants emitted under various operating conditions is necessary for the purposes of regulation enforcement or determination of regulation compliance, The Permittee shall cooperate with the Department to provide: a) entrance to a location suitable for stack sampling, b) sampling ports at locations where representative samples may be obtained, c) staging and ladders to support personnel and equipment for performing tests, d) a suitable power source at the sampling location for the operation of sampling equipment, and e) such other reasonable facilities as may be requested by the Department.
	16.) Emissions Compliance Testing (Stack Testing), shall be determined in accordance with 310 CMR 7.13, and 40 CFR Part 60, Appendix A (Method 7 for oxides of nitrogen (NO_x), Method 6 for sulfur dioxide (SO_2), Method 10 for carbon monoxide (CO), Methods 1 to 5 for TSP, Method 3A for Oxygen (O_2), Method 9 for opacity, Method 24 for volatile matter content, water content, density, volume of solids and weight of solids of surface coatings, Method 25 Total gaseous non-methane emissions as carbon or any other test method approved by the Department or EPA) or 40 CFR 63, Appendix A. Prior to Stack Testing, appropriate testing ports shall be constructed so as to accommodate the requirements as stipulated in 40 CFR Part 60, Appendix A or 40 CFR 63, Appendix A. Capture efficiency shall be determined in accordance with the requirements of 40 CFR 51, Appendix M, Method 204, "Criteria for and Verification of a Permanent or Temporary Total Enclosure".
	17.) Smoke and opacity limits shall be determined in accordance with EPA Method 9, as specified in 40 CFR 60, Appendix A in accordance with 310 CMR 7.00 Appendix C (9)(b).

Table 5	
EU #	**Record Keeping Requirements**
1, 2, 4, 13, 14 and 15	1.) In accordance with Permit No.: C-P-89-008 and 310 CMR 7.18(14)(c), the Permittee shall prepare and maintain daily records sufficient to demonstrate compliance consistent with the applicable averaging time stated in 310 CMR 7.18(2)(a). Records kept to demonstrate compliance shall be kept on site for five years from date of generation and shall be made available to representatives of the Department and EPA in accordance with 310 CMR 7.00, Appendix C (10)(b). Such records shall include but are not limited to: 1. Identity, quantity, formulation and density of coating(s) used; 2. Identity, quantity, formulation and density of any diluent(s) and clean-up solvent(s) used; 3. Solids content of any coating(s) used; 4. Actual operational and emissions characteristics of the coating line and any appurtenant

Table 5	
EU #	**Record Keeping Requirements**
	emissions capture and control equipment; 5. Quantity of product processed; and 6. Any other requirements specified by the Department in any approval(s) and/or order(s).
1, 2, and 4	2.) In accordance with Permit Application No. CM-86-IF-035, the Permittee shall keep the following records: (a) Daily product log identifying the formulations used on each line, the duration of use and the amount(s) used.
	3.) In accordance with Permit Application No. C-P-88-038 R, the Permittee shall keep a daily compliance log. This log will be made available to the Department and made available upon request. This log will indicate the formulations used, the amount of solids applied and the pounds VOCs emitted per machine per day. A daily average will be maintained indicating compliance status. All logs shall be clearly labeled, dated, and signed by a responsible official or his designee.
1, 3, 4, 6, 8, 9, 11, 12, 13, 14, 15, 16, 18, 19 and 20	4.) In accordance with Permit Transmittal No, W045640 amended 2/1/05, and W029171, the Permittee shall establish and continue on site the following records: 1.The initiation and completion dates for the proposed construction, reconstruction or alteration of the ABB 2-40.0AS3, Alstrom Air Pre-Heater Company Model 40.0TNV-5, ABB Air Pre-Heater2-60.OAS5+, Alstrom Air Pre-Heater Company, Model 80-TNV5 and Combustion Engineering 15.0 TRG 70 thermal oxidizers. Also the dates of removal of the older thermal oxidizers. 2. ABB 2-40.0AS3, Alstrom Air Pre-Heater Company Model 40.0TNV-5, ABB Air Pre-Heater2-60.OAS5+, Alstrom Air Pre-Heater Company, Model 80-TNV5 and Combustion Engineering 15.0 TRG 70 thermal oxidizer's recorded operating temperature. 3. Compliance records sufficient to demonstrate that emissions have not exceeded what is allowed by this approval. Such records may include daily production records, raw material usage rates, fuel purchase receipts, emissions test results, monitoring equipment data and reports. 4. Maintenance: A record of routine maintenance activities performed on the ABB 2-40.0AS3, Alstrom Air Pre-Heater Company Model 40.0TNV-5, ABB Air Pre-Heater2-60.OAS5+, Alstrom Air Pre-Heater Company, Model 80-TNV5 and Combustion Engineering 15.0 TRG 70 thermal oxidizers and monitoring equipment including, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed. Malfunctions: A record of all malfunctions on the ABB 2-40.0AS3, Alstrom Air Pre-Heater Company Model 40.0TNV-5, ABB Air Pre-Heater2-60.OAS5+ and Alstrom Air Pre-Heater Company, Model 80-TNV5 thermal oxidizers and monitoring equipment including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective action taken; the date and time corrective actions were initiated; and the date and time corrective actions were completed and the emission unit returned to compliance. All records shall be maintained up-to-date such that twelve-month rolling period information is readily available for Department examination.
10	5.) In accordance with CM-87-IF-023, the Permittee shall establish and maintain a record keeping system to document the emissions.
11 and 12	6.) In accordance with Permit No. CM-87-IF-001, the Permittee shall keep the following records: (a) Daily product log identifying the formulations used on each line, the duration of use and the amount(s) used.

Table 5	
EU #	**Record Keeping Requirements**
16	7.) In accordance with Permit Transmittal #109961, a record keeping system shall be established and maintained on site by the Permittee. All records shall be maintained up-to-date such that year-to-date information is readily available for Department examination.
	8.) In accordance with Permit Transmittal #109961, the Permittee shall keep compliance records sufficient to demonstrate that emissions have not exceeded what is allowed by this approval and will include continuous temperature monitoring of the RTO. EU 16's center bed combustion zone temperature and LEL measurement readings shall be recorded electronically.
	9.) In accordance with Permit Transmittal #109961, the Permittee shall keep a record of routine maintenance activities performed on emission unit, control equipment and monitoring equipment including, at a minimum, the type or a description of maintenance performed and the date and time work was completed.
	10.) In accordance with Permit Transmittal #109961, the Permittee shall keep a record of all malfunctions on the emission unit, control equipment and monitoring equipment including, at a minimum: the date and time the malfunction occurred; a description of the malfunction and the corrective actions were initiated; and the date and time corrective actions were completed and the emission unit returned to compliance.
	11.) In accordance with Permit Transmittal #109961,the Permittee shall continuously record the RTO combustion chamber temperatures to demonstrate that it is operating at or above the set point temperature required to maintain a 99% destruction efficiency.
6, 8-16, 18, 19 and 20	12.) In accordance with §60.445(a) of 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, The Permittee shall maintain a calendar month record of all coatings used and the results of the reference test method specified in § 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.
17	13.) In accordance with 310 CMR 7.04(4)(a), the Permittee shall post the results of said inspection, maintenance, and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near the facility.
18,19 and 20	14.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3410(a)1), the Permittee shall keep records specified in 63.10(b)1 and (b)2, on a monthly basis of all measurements needed to demonstrate compliance including: Control Device and capture system operating parameter data in accordance with all applicable requirements; and Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with all applicable requirements.
	15.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3410(a)2), the Permittee shall keep records specified in 63.10(c) for each CMS (Continuous Monitoring System) in accordance with all applicable requirements.

Table 5	
EU #	**Record Keeping Requirements**
Facility Wide	16.) In accordance with 310 CMR 7.02(7), the Permittee shall maintain a copy of this approval, and any subsequent modifications of this approval, on-site for as long as the approval is valid. The approval is valid until one of the following conditions occur: the equipment is dismantled or removed from the facility, the facility notifies the Department that the approval is no longer valid, the equipment is substantially reconstructed or altered and subject to 310 CMR 7.02 or the approval is superceded by another approval.
	17.) In accordance with 310 CMR 7.00 Appendix C (10)(b), The Permittee shall maintain records of all monitoring data and supporting information on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application.
	18.) In accordance with 310 CMR 7.12(1)(d), upon verification of the information required by 310 CMR 7.12(1)(a), the Department will review the supplied information. All such emissions data shall be available to the public during normal working hours at the office of the Bureau of Waste Prevention and at such other offices as the Department may specify. Copies of all information supplied to the Department pursuant to 310 CMR 7.12 shall be retained by the facility owner or operator for five (5) years after the date the report is submitted

Table 6	
EU #	**Reporting Requirements**
1,2 and 4	1.) In accordance with Permit Application No. C-P-88-038 R, the Permittee shall submit a monthly report summarizing each day, indicating the number of days in the previous month the facility was in and out of compliance. This report will also contain a running summary of the total pounds of VOCs per month indicating that the Permittee will not exceed the yearly cap. Any exeedance of the RACT number must be reported in writing to the Department within 3 days of the exceedance. (Fax type transmittal or the express mail services shall be utilized, if necessary, to ensure prompt reporting). The monthly reports shall be submitted by the 15th of the following month.
1, 2,4, 6, 7, 8, 9, 11,12,13, 14, 15 and 16	2.) In accordance with Permit Application Nos. CM-86-IF-035, CM-83-IF-036, CM-87-IF-001 and Permit Transmittal No. 109961, the Permittee shall notify the Regional Bureau of Waste Prevention, Compliance and Enforcement office (C&E) by telephone and within seven days in writing in the event of an unexpected or unavoidable failure of the emission control system or in the event of a planned shutdown of such equipment which may result in uncontrolled emissions to the ambient air. A planned shut down requires prior Departmental approval.
1,2,3,4, 6, 8, 9, 11, 12, 13, 15, 18,19,20	3.) In accordance with Permit transmittal number W029171 and W045640, amended 2/1/2005 the Permittee shall notify the Regional Bureau of Waste Prevention, Compliance and Enforcement office, by telephone or fax as soon as possible (but no later than 24 hours) after the occurrence of any UPSETS or MALFUNCTIONS to the facility equipment, air pollution control equipment, or monitoring equipment <u>which result in an excess emission to the air and/or a condition of air pollution.</u> The Permittee shall submit written notification with9in two (2) business days of such an event.

Table 6	
EU #	**Reporting Requirements**
	4.) In accordance with Permit transmittal number W045640 amended 2/01/2005, the Permittee shall notify the Department when the existing thermal oxidizers are disconnected, when the existing thermal oxidizers are removed and when new coating lines are added to the new or existing thermal oxidizers.
	5.) In accordance with Permit transmittal number W045640 amended 2/01/2005, the Permittee shall notify the Department when within 15 days of initial startup of each thermal oxidizer
	6.) In accordance with Permit transmittal number W045640 amended 2/01/2005, the Permittee shall notify the Department when Within 120 days of installation of each Thermal Oxidizer the Permittee shall submit to the Department and the Administrator (Director Air Management Division, U.S. Air Management Division, U.S. EPA, John F. Kennedy Building, Boston MA 02203) a pretest protocol detailing methods to be employed for the required stack test to be conducted in accordance with 310 CMR 7.13(1), 310 CMR 7.13(2) and Permit Provision contained in Section VI, Item B. Within 30 days of conducting the required stack testing the Permittee shall supply the results to the Department and the Administrator.
6, 8-16, 18, 19 and 20	7.) Following initial stack test the Permittee shall submit quarterly reports to the Department and the Administrator of exceedances of the emission limits specified in 40 CFR 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Department and the Administrator semi-annually.
	8.) The Permittee shall notify the Department as soon as reasonably practical by telephone or fax after the occurrence of any upsets or malfunctions (i.e., any piece of equipment or device breakdown that causes an excess emission) and in writing within two (2) business days of such event.
	9.)All required reports must be certified by a responsible official of the Permittee as provided in 310 CMR 7.01(2)(c).
	10.) In accordance with §60.447(b) of 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, The Permittee shall submit quarterly reports to the Department of exceedances of the VOC emission limits specified in § 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Department semi-annually.
	11.) In accordance with §60.447(c) of 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations, The Permittee shall also submit reports at the frequency specified in § 60.7(c) (Semi-annually) when the incinerator temperature drops as defined under § 60.443(e). If no such periods occur, the owner or operator shall state this in the report.

Table 6	
EU #	**Reporting Requirements**
EU 3, 6, 8, 9, 11, 12, 13, 14, 16, 18, 19 and 20	12.) In accordance with Permit Transmittal No.: W029171 and W045640 amended 2/01/2005, the Permittee shall notify the Department when, within 120 days of installation of the Thermal Oxidizer, the Permittee shall submit to the Department and the Administrator (Director Air Management Division, U.S. Air Management Division, U.S. EPA, John F. Kennedy Building, Boston MA 02203) a pretest protocol detailing methods to be employed for the required stack test to be conducted in accordance with 310 CMR 7.13(1), 310 CMR 7.13(2) and Permit Provision contained in Section VII, Item B. Within 30 days of conducting the required stack testing the Permittee shall supply the results to the Department and the Administrator.
	13.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3410(a)1), the Permittee shall provide an initial notification for new and reconstructed affected sources must be submitted as required by § 63.9(b). For the purpose of this subpart, a title V or part 70 permit application may be used in lieu of the initial notification required under § 63.9(b), provided the same information is contained in the permit application as required by § 63.9(b) and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA to implement and enforce this subpart.
	14.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3410(a)1), the Permittee shall submit a semiannual compliance report according to paragraphs (c)(1) and (2) of this section. In accordance with 40 CFR 63.3400(c)(v)and 310 CMR 7.00 Appendix C(10)(f), the Permittee shall submit the semiannual reports by January 30 and July 30.
	15.) The Permittee shall submit the required semi-annual report in accordance with 63.3410(c)(2).
	16.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3400(e)), the Permittee shall submit a Notification of Compliance Status as specified in § 63.9(h).
	17.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3400(f)), the Permittee shall submit performance test reports as specified in § 63.10(d)(2) if using a control device to comply with the emission standard and you have not obtained a waiver from the performance test requirement or you are not exempted from this requirement by § 63.3360(b). The performance test reports must be submitted as part of the notification of compliance status required in § 63.3400(e).
	18.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3400(g), the Permittee shall submit startup, shutdown, and malfunction reports as specified in § 63.10(d)(5)., except that the provisions in subpart A of this part pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.

Table 6	
EU #	**Reporting Requirements**
1-16	19.) In accordance with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (63.3410(a)1), the Permittee shall submit and initial notification as required by 63.9(b) no later than one year before the compliance date specified in 63.3330(a).
Facility Wide	20.) In accordance with Permit Transmittal No.: W029171, the Permittee shall notify the Department of the removal of any existing RACT lines.
	21.) Submit Annual Emission Statements in accordance with 310 CMR 7.12.
	22.) Any construction, substantial reconstruction or alteration, as described in 310 CMR 7.02, at a facility subject to the reporting requirements of 310 CMR 7.12, shall be reported to the Department on the next required source registration.
	23.) In accordance with 310 CMR 7.13(1)(d), if and when the Department has determined that stack testing is necessary to ascertain compliance with Department's regulations or design approval provisos The Permittee shall cause such stack testing, the results of which to be summarized and submitted to the Department with analysis and report within such time as agreed in this permit.
	24.) In accordance with 310 CMR 7.00 Appendix C (5)(b) 9., The Permittee shall submit annually a certification that the facility is maintaining the required records to assure the facility is in compliance with the applicable requirements designated in this permit. (See Provision 10 in "GENERAL CONDITIONS FOR OPERATING PERMIT").
	25.) In accordance with 310 CMR 7.00 Appendix C (10)(a), The Permittee shall submit to the Department any record relevant to this operating permit or to the emissions of any air contaminant from the facility within 30 days of the request by the Department.
	26.) In accordance with 310 CMR 7.00 Appendix C: (10)(c), the Permittee shall submit by January 30 and July 30 the results of any required monitoring, and a certification that The Permittee is maintaining the required records to assure the facility is in compliance with the applicable requirements for the previous six months.
	27.) In accordance with 310 CMR 7.00 Appendix C (10)(f), The Permittee shall promptly report to the Department all instances of deviations from the permit requirements specified herein. This report shall include the deviation itself, including those attributable to upset conditions (as defined herein), the probable cause of the deviation, and any corrective actions or preventative measures taken.

C. GENERAL APPLICABLE REQUIREMENTS

The Permittee shall comply with all generally applicable requirements contained in 310 CMR 7.00 et. seq. and 310 CMR 8.00 et. seq., when subject.

D. REQUIREMENTS NOT CURRENTLY APPLICABLE

The permittee is currently not subject to the following requirements:

Table 7

Regulation	Reason
310 CMR 7.15:Asbestos	NA
42 U.S.C. 7401 §112 (r): Prevention of Accidental Release	NA
42 U.S.C.7401 § 601 Stratospheric Ozone	NA

5. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to the following special provisions that are not contained in Tables 3, 4, 5 and 6.

Table 8

Special Terms And Conditions

1.) Should any nuisance condition(s) occur as a result of the operation of EU 1-EU 20 then appropriate steps shall be taken to abate said condition(s). (State only applicable per 310 CMR 7.01(1)).

2.) In accordance with 310 CMR 7.10 no person owning, leasing, or controlling a source of sound shall willfully, negligently, or through failure to provide necessary equipment, service, or maintenance or take necessary precautions cause, suffer, allow, or permit unnecessary emissions from said source of sound that may cause noise. (state only)

3.) EU 1 - 4 and 6 - 20 shall continue to emit through their respective exhaust stacks, having the following parameters:

EU 1, 3, 4, 15, 18, 19 and 20:	Stack Height (feet above ground):	50
	Stack Exit diameter (inches):	52
	Stack Material:	refractory lined carbon steel
Emergency By\ pass stack (EU 4 only)	Stack Height (feet above roof top):	10
	Stack Exit diameter (inches):	14
	Stack Material:	stainless steel
Emergency By pass stack (EU 18 only)	Stack Height (feet above roof top):	10
	Stack Exit dimension (inches):	28 x 28
	Stack Material:	stainless steel
Emergency By pass stack (EU 19 only)	Stack Height (feet above roof top):	10
	Stack Exit diameter (inches):	20
	Stack Material:	stainless steel

Table 8		
Special Terms And Conditions		
Emergency By pass stack (EU 20 only)	Stack Height (feet above roof top): Stack Exit diameter (inches): Stack Material:	10 20 stainless steel
EU 2 :	Stack Height (feet above ground): Stack Exit diameter (inches): Stack Material:	50 41 refractory lined carbon steel
EU 6, 8, 9, 11 and 12	Stack Height (feet above ground): Inside Exit Diameter (inches): Stack Material:	50 52 carbon steel
Emergency By pass stack (EU 6 only)	Stack Height (feet above roof top): Stack Exit dimension (inches): Stack Material:	10 24 x 24 stainless steel
Emergency By pass stack (EU 8 only)	Stack Height (feet above roof top): Stack Exit diameter (inches): Stack Material:	10 35 carbon steel
Emergency By pass stack (EU 9 only)	Stack Height (feet above roof top): Stack Exit diameter (inches): Stack Material:	10 46 carbon steel
Emergency By pass stack (EU 11 only) l	Stack Height (feet above roof top): Stack Exit diameter (inches): Stack Material:	10 46 carbon steel
Emergency By pass stack (EU 12 only)	Stack Height (feet above roof top): Stack Exit diameter (inches): Stack Material:	10 46 carbon steel
EU 7:	Stack Height (feet above ground): Stack Exit diameter (inches): Stack Material:	48.5 32 carbon steel
EU 10:	Stack Height (feet above ground): Stack Exit diameter (inches): Stack Material:	42 22 x20 and 26 x 23 carbon steel
EU 13, 14 and 16: (Phase III)	Stack Height (feet above ground): Stack Exit diameter (inches): Stack Material:	50 65 steel

Table 8

Special Terms And Conditions

EU 13 and 14's Water based product bypass stack:		
(Phase III & IV)	Stack Exit dimension (inches):	23.5 x 26
	Stack Material:	carbon steel
EU 16's Water based product bypass stack:		
(Phase III & IV)	Stack Height (feet above ground):	36
	Stack Exit diameter (inches):	44
	Stack Material:	steel
	Stack Height (feet above ground):	36
	Stack Exit diameter (inches):	44
	Stack Material:	steel
EU 13, 14	Stack Height (feet above ground):	50
(Phase IV)	Stack Exit diameter (inches):	52
	Stack Material:	steel
EU 16:	Stack Height (feet above ground):	50
(Phase IV)	Stack Exit diameter (inches):	65
	Stack Material:	steel
EU 17	Stack Height (feet above roof top):	8
	Stack Exit diameter (inches):	12
	Stack Material:	stainless steel

4.) In accordance with C-P-89-008 and C-P-88-038 R, the Permittee shall not emit more than 3.2 pounds VOC per gallon solids applied as averaged over each 24 hour period for the Following lines; PS-1*(EU 1), PS-2*(EU 2), PS-3 (EU 1), PS-4 (EU 2), TC1-1*(EU 3), TC1-2*(EU 4), TC1-3* (EU 5), TC2-1 (EU 4) and Custom Dye Coating Line (EU 15).

Compliance with this standard shall be demonstrated by comparing the allowable and actual emissions on the daily log. Allowable emissions for each day will be determined by multiplying the amount of gallons of solids applied on all 9 lines by the RACT standard. Actual emissions will be based on emissions from each coater and applying, as appropriate the VOC control efficiency of the incinerator associated with the specific machine.

This will be done by maintaining over a period of 24 hours per day the average VOC content on a solids applied basis to be equal to or less than RACT for the existing lines. This will be demonstrated by dividing the pounds VOC emitted by the total gallons of solids used on a daily basis (24 hour period).

*Denotes The Permittee's Wall Street facility EUs.

5.) The Permittee shall post, on or near the system control panel or oven controls the standard operating procedure for the incinerator for EUs 3,6,7,8 and 9**.**

Table 8
Special Terms And Conditions
6.) In accordance with Permit Application # CM-87-IF-023 and C-P-89-008 and for EU 10, 13 and, 14 the Department reserves the right to require changes in the Standard Operating Procedures, record keeping and require additional monitoring if it is determined necessary by the Department to ensure continuous compliance with the Air Quality Control Regulations.
7.) In accordance with 310 CMR 7.18(1)(c), the Permittee shall store and dispose of volatile organic compounds in a manner which will minimize evaporation to the atmosphere. Proper storage shall be in a container with a tight fitting cover. Proper disposal shall include incineration in an incinerator approved by the Department, transfer to another person licensed by the Department to handle VOC, or any other equivalent method approved by the Department.
8.) In accordance with 310 CMR 7.18(1)(d), The Permittee shall continue to comply with the requirements of 310 CMR 7.18, even if emissions no longer exceed the requirements of 310 CMR 7.18.
9.) In accordance with Permit No. C-P-89-008, the Permittee shall enclose the application stations and coating supply reservoirs for EU 13 and 14 such that all VOC emissions will be captured and contained for discharge and will be exhausted into the dryer air system which will discharge through the afterburner. The required capture efficiency is 100%.
10.) In accordance with Permit Transmittal No. W029171 and W045640, the Permittee shall continue to operate and implement good house keeping procedures within their facility. Good housekeeping is defined as storing, using and disposing of formulations containing HAPs/VOC in a manner, which will minimize evaporation to the atmosphere. Proper storage shall be in a container with a tight fitting cover and covered containers shall be used during mixing and transferring the HAPs/VOC containing formulations. The Permittee shall dispose of VOC material in a manner consistent with Federal and State Hazardous Waste Regulations. All used wiping rags shall be stored in a covered container.
11.) The Permittee has indicated that it is subject to, and complying with, the requirements of 310 CMR 7.16, U Reduction of Single Occupant Commuter Vehicle Use. The Permittee shall continue to comply with 310 CMR 7.16.
12.) In accordance with Permit Transmittal No. W029171 and W045640, the Permittee may use the bypass stacks for EU 4, EU 6, EU 8, EU 9, EU 11, EU 12, EU 13, EU 14, EU 16, EU 18, EU 19 and EU 20 for emergency purposes or when water based coatings containing no VOC/HAPs are being used. Emergency means any situation arising from sudden and reasonable unforeseeable events beyond the control of this source, including acts of God, which would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emission attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of these things. The Permittee may complete an existing production run but shall not begin any new production runs until the oxidizer is operating as permitted. The existing production run shall be defined as the completion of the existing roll of material being coated. Water Based Coatings are coatings consisting of aqueous solutions of polymer resins with less than 1 percent VOC/HAPs by weight.
13.) EU 18 and EU 19 shall not commence production until ABB 2-40.0AS3 is at its operating temperature. EU 2 shall not commence production until the Combustion Engineering 15.0 TRG 70 thermal oxidizer is at operating temperature. In the event of thermal oxidizer upsets or

Table 8
Special Terms And Conditions
failures, the Permittee shall cease production. An upset or failure shall be defined as the inability of the thermal oxidizer to perform in accordance with permit conditions. The Permittee may complete an existing production run but shall not begin any new production runs until the oxidizers are operating as permitted. The existing production run shall be defined as the completion of the existing roll of material being coated.
14.) In accordance with 310 CMR 7.02(3)(k), the Permittee may construct and install the proposed thermal oxidizers within two years of this plan approval's issuance. Failing to install the proposed thermal oxidizers within the two year period, the Permittee shall notify the Department of the proposed modifications to determine applicable requirements.
15.) Permit Transmittal No. W045640, this approval is specifically for installation and operation of the equipment as identified in the air plan application and/or this approval letter. Please be aware that any construction, reconstruction, alteration or replacement of this equipment or any existing equipment at the facility may require a new plan approval, in accordance with 310 CMR 7.02. Except for very limited circumstances a new plan approval or a plan approval modification will be required if equipment is modified or altered. Likewise, except for very limited circumstances, a new plan approval is required if equipment is replaced, even if the new equipment is of the same type, size and production capacity. The air pollution control regulations are complex and it is important to review them in their entirety to understand the rules and the regulatory requirements. The Permittee is urged to contact the Department in writing for guidance.
16.) EU 1-16 shall comply with 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating by December 2, 2005

6. ALTERNATIVE OPERATING SCENARIOS

The Permittee did not request alternative operating scenarios in its operating permit application.

7. EMISSIONS TRADING

A. Intra-facility emission trading

The permittee did not request intra-facility emissions trading in its operating permit application. Pursuant to 310 CMR 7.00: Appendix C (7)(b), emission trades, provided for in this permit, may be implemented provided the Permittee notifies The United States Environmental Protection Agency (EPA) and the Department at least fifteen (15) days in advance of the proposed changes and the Permittee provides the information required in 310 CMR 7.00: Appendix C (7)(b) 3.

Any intra-facility change that does not qualify pursuant to 310 CMR 7.00: Appendix C (7)(b) 2. is required to be submitted to the Department pursuant to 310 CMR 7.00: Appendix B.

B. Inter-facility emission trading

The permittee did not request inter-facility emissions trading in its operating permit application.

All increases in emissions due to emission trading, must be authorized under the applicable requirements of 310 CMR 7.00: Appendix B (the "Emissions Trading Program") and the 42 U.S.C. §7401 et seq. (the "Act"), and provided for in this permit.

8. COMPLIANCE SCHEDULE

The Permittee has indicated that the facility is in compliance and shall remain in compliance with the applicable requirements contained in Sections 4 and 5.

In addition, the Permittee shall comply with any applicable requirements that become effective during the permit term.

GENERAL CONDITIONS FOR OPERATING PERMIT

9. FEES

The Permittee has paid the permit application processing fee and shall pay the annual compliance fee in accordance with the fee schedule pursuant to 310 CMR 4.00.

10. COMPLIANCE CERTIFICATION

All documents submitted to the Department shall contain certification by the responsible official of truth, accuracy, and completeness. Such certification shall be in compliance with 310 CMR 7.01(2) and contain the following language:

“I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.”

The Department will submit an "Operating Permit Reporting Kit" to the Permittee which contains instructions and the Annual Compliance Report and Certification and the Semi-Annual Monitoring summary Report and Certification.

(a) Annual Compliance Report and Certification

The Responsible Official shall certify, annually for the calendar year, that the facility is in compliance with the requirements of this permit. The report shall be postmarked or delivered by January 30 to the Department and to the Regional Administrator, U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

i. the terms and conditions of the permit that are the basis of the certification;
ii. the current compliance status and whether compliance was continuous or intermittent during the reporting period;
iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
iv. any additional information required by the Department to determine the compliance status of the source.

(b) Semi-Annual Monitoring Summary Report and Certification

The Responsible Official shall certify, semi-annually on the calendar year, that the facility is in compliance with the requirements of this permit. The report shall be postmarked or delivered by January 30 and July 30 to the Department. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

i. the terms and conditions of the permit that are the basis of the certification;
ii. the current compliance status during the reporting period;
iii. the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods;
iv. whether there were any deviations during the reporting period;
v. if there are any outstanding deviations at the time of reporting, and the Corrective Action Plan to remedy said deviation;
vi. whether deviations in the reporting period were previously reported;
vii. if there are any outstanding deviations at the time of reporting, the proposed date of return to compliance;
viii. if the deviations in the reporting period have returned to compliance and date of such return to compliance; and

ix. any additional information required by the Department to determine the compliance status of the source.

11. NONCOMPLIANCE

Any noncompliance with a permit condition constitutes a violation of 310 CMR 7.00: Appendix C and the Clean Air Act, and is grounds for enforcement action, for permit termination or revocation, or for denial of an operating permit renewal application by the Department and/or EPA. Noncompliance may also be grounds for assessment of administrative or civil penalties under M.G.L. c.21A, §16 and 310 CMR 5.00; and civil penalties under M.G.L. c.111, §142A and 142B. This permit does not relieve the Permittee from the obligation to comply with any other provisions of 310 CMR 7.00 or the Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this permit.

12. PERMIT SHIELD

(a) This facility has a permit shield provided that it operates in compliance with the terms and conditions of this permit. Compliance with the terms and conditions of this permit shall be deemed compliance with all applicable requirements specifically identified in Sections 4, 5, 6, and 7, for the emission units as described in the Permittee's application and as identified in this permit.

Where there is a conflict between the terms and conditions of this permit and any earlier approval or permit, the terms and conditions of this permit control.

(b) The Department has determined that the Permittee is not currently subject to the requirements listed in Section 4, Table 7.

(c) Nothing in this permit shall alter or affect the following:

(i) the liability of the source for any violation of applicable requirements prior to or at the time of permit issuance.
(ii) the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401, §408(a); or
(iii) the ability of EPA to obtain information under 42 U.S.C. §7401, §114 or §303 of the Act.

13. ENFORCEMENT

The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.02(8)(i), 7.04(9), 7.05(8), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22 and any condition(s) designated as "state only" are not federally enforceable because they are not required under the Act or under any of its applicable requirements. These regulations and conditions are not enforceable by the EPA. Citizens may seek equitable or declaratory relief to enforce these regulations and conditions pursuant to Massachusetts General Law Chapter 214, Section 7A.

All other terms and conditions contained in this permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the Department, EPA and citizens as defined under the Act.

A Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

14. PERMIT TERM

This permit shall expire on the date specified on the cover page of this permit, which shall not be later than the date 5 years after issuance of this permit.

Permit expiration terminates the Permittee's right to operate the facility's emission units, control equipment or associated equipment covered by this permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

15. PERMIT RENEWAL

Upon the Department's receipt of a complete and timely application for renewal, this facility may continue to operate subject to final action by the Department on the renewal application.

In the event the Department has not taken final action on the operating permit renewal application prior to this permit's expiration date, this permit shall remain in effect until the Department takes final action on the renewal application, provided that a timely and complete renewal application has been submitted in accordance with 310 CMR 7.00: Appendix C (13).

16. REOPENING FOR CAUSE

This permit may be modified, revoked, reopened, and reissued, or terminated for cause by the Department and/or EPA. The responsible official of the facility may request that the Department terminate the facility's operating permit for cause. The Department will reopen and amend this permit in accordance with the conditions and procedures under 310 CMR 7.00: Appendix C (14).

The filing of a request by the Permittee for an operating permit revision, revocation and reissuance, or termination, or a notification of a planned change or anticipated noncompliance does not stay any operating permit condition.

17. DUTY TO PROVIDE INFORMATION

Upon the Department's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records that the Permittee is required to retain by this permit.

18. DUTY TO SUPPLEMENT

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a complete renewal application was submitted but prior to release of a draft permit.

The Permittee shall promptly, on discovery, report to the Department a material error or omission in any records, reports, plans, or other documents previously provided to the Department.

19. TRANSFER OF OWNERSHIP OR OPERATION

This permit is not transferable by the Permittee unless done in accordance with 310 CMR 7.00: Appendix C (8)(a). A change in ownership or operation control is considered an administrative permit amendment if no other change in the permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between current and new Permittee, has been submitted to the Department.

20. PROPERTY RIGHTS

This permit does not convey any property rights of any sort, or any exclusive privilege.

21. INSPECTION AND ENTRY

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Department, and EPA to perform the following:

(a) enter upon the Permittee's premises where an operating permit source activity is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor at reasonable times any substances or parameters for the purpose of assuring compliance with the operating permit or applicable requirements as per 310 CMR 7.00 Appendix C (3)(g)(12).

22. PERMIT AVAILABILITY

The Permittee shall have available at the facility, at all times, a copy of the materials listed under 310 CMR 7.00: Appendix C (10)(e) and shall provide a copy of the permit, including any amendments or attachments thereto, upon request by the Department or EPA.

23. SEVERABILITY CLAUSE

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

24. EMERGENCY CONDITIONS

The Permittee shall be shielded from enforcement action brought for noncompliance with technology based[1] emission limitations specified in this permit as a result of an emergency[2]. In order to use emergency as an affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

(a) an emergency occurred and that the Permittee can identify the cause(s) of the emergency;

(b) the permitted facility was at the time being properly operated;

(c) during the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and

(d) the Permittee submitted notice of the emergency to the Department within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

If an emergency episode requires immediate notification to the Division of Hazardous Waste/Emergency Response and the Emergency Response Planning Council, immediate notification to the appropriate parties should be made as required by law.

25. PERMIT DEVIATION

Deviations are instances where any permit condition is violated and not reported as an emergency pursuant to section 24 of this permit. Reporting a permit deviation is not an affirmative defense for action brought for noncompliance. Any reporting requirements listed in Table 6. of this Operating Permit shall supercede the following deviation reporting requirements, if applicable.

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[1] Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

[2] An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

The Permittee shall report to the Department's Regional Bureau of Waste Prevention the following deviations from permit requirements, by telephone or fax, within three (3) days of discovery of such deviation:

- Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.
- Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the permit or approval as surrogate for an emission limit.
- Exceedances of permit operational limitations directly correlated to excess emissions.
- Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.
- Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the Massachusetts Department of Environmental Protection Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is included with the Operating Permit. This report shall include the deviation, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone or fax within 3 days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the regional Bureau of Waste Prevention within ten (10) days of discovery. For deviations, which do not require 3-day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification.

26. OPERATIONAL FLEXIBILITY

The Permittee is allowed to make changes at the facility consistent with 42 U.S.C. §7401, §502(b)(10) not specifically prohibited by the permit and in compliance with all applicable requirements provided the Permittee gives the EPA and the Department written notice fifteen days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C (5)(i). The notice shall comply with the requirements stated at 310 CMR 7.00: Appendix C (7)(a) and will be appended to the facility's permit. The permit shield allowed for at 310 CMR 7.00: Appendix C (12) shall not apply to these changes.

27. MODIFICATIONS

(a) Administrative Amendments - The Permittee may make changes at the facility which are considered administrative amendments pursuant to 310 CMR 7.00: Appendix C (8)(a) 1., provided they comply with the requirements established at 310 CMR 7.00: Appendix C (8)(b).

(b) Minor Modifications - The Permittee may make changes at the facility which are considered minor modifications pursuant to 310 CMR 7.00: Appendix C (8)(a) 2., provided they comply with the requirements established at 310 CMR 7.00: Appendix C (8)(d).

(c) Significant Modifications - The Permittee may make changes at the facility which are considered significant modifications pursuant to 310 CMR 7.00: Appendix C (8)(a) 3., provided they comply with the requirements established at 310 CMR 7.00: Appendix C (8)(c).

(d) No permit revision shall be required, under any approved economic incentives program; marketable permits program, emission-trading program and other similar programs or processes, for changes that are provided in this operating permit. A revision to the permit is not required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program under Title IV of the Act, provided that such increases do not require an operating permit revision under any other applicable requirement.

APPEAL CONDITIONS FOR OPERATING PERMIT

This permit is an action of the Department. If you are aggrieved by this action, you may request an adjudicatory hearing within 21 days of issuance of this permit. In addition, any person who participates in any public participation process required by the Federal Clean Air Act, 42 U.S.C. §7401, §502(b)(6) or under 310 CMR 7.00: Appendix C (6), with respect to the Department's final action on operating permits governing air emissions, and who has standing to sue with respect to the matter pursuant to federal constitutional law, may initiate an adjudicatory hearing pursuant to Chapter 30A, and may obtain judicial review, pursuant to Chapter 30A, of a final decision therein.

If an adjudicatory hearing is requested, the facility must continue to comply with all existing federal and state applicable requirements to which the facility is currently subject, until a final decision is issued in the case or the appeal is withdrawn. During this period, the application shield shall remain in effect, and the facility shall not be in violation of the Act for operating without a permit.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the permit is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to The Commonwealth of Massachusetts in the amount of one hundred dollars ($100.00) must be mailed to:

The Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency) county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The Department may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

28. NOMENCLATURE

< - Less Than

> - Greater Than

#/hr - Pounds Per Hour

10^6 BTU/hr - 1,000,000 British Thermal Units per Hour

AQCR - Air Quality Control Region

ASTM - American Society of Testing Materials

CEM - Continuous Emission Monitor

CFR – Code of Federal Regulations

CMR- Code of Massachusetts Regulation

CO – Carbon Monoxide

EPA - Environmental Protection Agency

EU - Emission Unit

EU# - Emission Unit Number

FMF FAC. NO. - Facility Master File Number

FMF RO NO. - Facility Master File Regulated Object Number

FT^3/day - Cubic Feet Per Day

gph – gallons per hour

HAPs – Hazardous Air Pollutants

HHV - Higher Heating Value

ISO - Represent 59°F, 60% Relative Humidity, 29.92 Inches Mercury At Sea Level

LEL – Lower Explosive Limit

MADEP – Massachusetts Department of Environmental Protection

MMBtu/hr – Million British Thermal Units Per Hour

NA – not applicable

NH3 - Ammonia

No. – number

NOx – Nitrogen Oxides

PB - Lead

PLT ID – Plant Identification

PM – Particulate Matter

PPM – Parts Per Million

PS – Pressure Sensitive

PTE – Potential to Emit

RTO – Regenerative Thermal Oxidizer

SO2 – Sulfur Dioxide

SSEIS – Stationary Source Emission Inventory System

tpy – Tons Per Year

USC - United States Code

VOC – Volatile Organic Compounds